

C A D W A L A D E R

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April 28, 2022

**VIA ECF**

Hon. Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: United States v. Ronald Romano, Case No. 20-cr-00585

Dear Judge Carter:

I represent Mr. Romano in this matter. The parties have reached an agreement on a pre-trial resolution to this matter and thus, I respectfully request that the Court schedule a change of plea hearing for May 17, 2022 at 12:00 p.m., a date provided by the Court. Given the anticipated disposition, the parties jointly request that the pre-trial conference scheduled for Thursday, May 5, 2022 be adjourned. Mr. Romano intends to plead guilty to Count Three of the above-referenced Indictment pursuant to a written plea agreement. Mr. Romano consents to the exclusion of time between May 5, 2022 and the next scheduled conference. The government joins in this request.

I am available at Your Honor's convenience if there are any questions or if further information is required.

Respectfully submitted,

/s/ Todd Blanche

Todd Blanche

cc: AUSA Nicholas W. Chiuchiolo

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Hon. Andrew L. Carter, Jr.  
April 28, 2022

AUSA Timothy V. Capozzi